

Tatyana Evgenievna Drevaleva
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Plaintiff in Pro Per

THE UNITED STATES DISTRICT COURT
FOR NORTHERN CALIFORNIA

)	Case No. 4:18-cv-03748-HSG
Tatyana E. Drevaleva)	
<i>Petitioner,</i>)	Declaration to the Administrative Motion
vs.)	For Permission to File the First Motion for
)	Summary Judgment in the U.S. District
1) The U.S. Department of Veterans Affairs)	Court for the Northern District of
)	California, the Civil Local Rule 7-11.
2) Mr. Denis Richard McDonough in his)	
capacity as a Secretary of the U.S.)	
Department of Veterans Affairs)	
810 Vermont Avenue, NW,)	Location: Courtroom 2 – 4th Floor
Washington, D.C. 20420)	1301 Clay Street, Oakland, CA 94612
<i>Defendants</i>)	Judge: The Hon. Haywood S. Gilliam
Facility:)	
New Mexico VA Healthcare System)	
1501 San Pedro Drive, S.E.)	
Albuquerque, NM, 87108)	

1 I, Plaintiff Tatyana Drevaleva, hereby declare:

- 2 1) I am a Plaintiff Pro Se and a party of this action
- 3 2) I have a personal knowledge of the facts stated herein, which are known by me to be
4 true and correct, and I will testify competently thereto
- 5 3) Previously, Judge Spero ordered the Parties to file Motions for Summary Judgments
6 on August 13, 2021
- 7 4) I already prepared my Motion for Summary Judgment in case No. 4:18-cv-03748-
8 HSG, and I was planning to file this Motion today that is August 12, 2021
- 9 5) On August 09, 2021, Judge Spero recused himself from judging all my lawsuits. He
10 did it because he had criminally conspired with Attorneys Robinson and Zack
- 11 6) Specifically, Spero ordered the U.S. Marshals service to serve Attorney Robinson
12 instead of serving real Defendants in case No. 4:21-cv-00684-HSG
- 13 7) Spero did it because he knew that both Investigative Files in cases No. 4:18-cv-
14 03748-HSG and 4:19-cv-01454-HSG were fabricated. There were no true and real
15 EEO investigations in these cases
- 16 8) Spero covered up criminal activities of Judge Alsup and Attorneys Robinson and
17 Zack
- 18 9) On August 12, 2021, Judge Gilliam transferred my lawsuit No. 4:18-cv-03748-HSG
19 to the District Court of New Mexico. It will severely delay a speedy and fair
20 resolution of my lawsuit
- 21 10) On August 12, 2021, Judge Gilliam recklessly disregarded the material facts of my
22 lawsuits and denied all my Motions in the lawsuit No. 4:18-cv-03748-HSG. Giliam
23 criminally covered up the material fact of the case that on June 12, 2017 Ms.
24 Dunkelberger hired young male employee Mr. David Williams to substitute my
25 employment, and she also hired another young male employee Mr. David Trujillo
- 26 11) In his August 12, 2021 Order, Gilliam wrote, page 4, lines 19-22, "there is at least a
27 factual question as to whether permitting an employee to take leave for international
28 travel on only one day's notice would have been a reasonable accommodation

consistent with the requirements of Plaintiff's probationary position as a medical instrument technician."

12) In my Motion for Summary Judgment that was I was planning to file today which is August 12, 2021, I addressed Gilliam's concern about "whether permitting an employee to take leave for international travel on only one day's notice"

13) Also, I found a case law *EEOC v. BNSF RAILWAY COMPANY*, No. 16-35457 (9th Circuit, 2020) that described granting preliminary injunction by statute in the Title VII/ADA case without evaluating four elements of the test for preliminary injunction

14) I urgently need to obtain permanent injunction because I am suffering from an irreparable harm

15) I am asking Judge Gilliam to allow me to file my Motion for Summary Judgment today that is August 12, 2021 at the U.S. District Court for the Northern District of California

16) I am asking Judge Gilliam to prohibit Attorney Zack to file her Motion for Summary Judgment because she is not going to tell the truth to the Court

17) I will ask the Court to evaluate the merits of my Motion for Summary Judgment, to determine that I am entitled to Summary Judgment as a matter of law, to determine that the Agency discriminated me against my desire to get pregnant, against my sex/gender, against my age, and against my temporary disability that was related to taking a time off to go to Russia to refill a prescription of my hormonal pills and to perform an IVF attempt.

18) I will also demonstrate that I am entitled to permanent injunction as a matter of law by statute without evaluating four elements of the test for preliminary injunction.

I declare under the penalty of perjury and under the Federal laws that all foregoing is true and correct. Executed at San Francisco, CA on August 12, 2021.

1 Respectfully submitted,

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3 s/ Tatyana Drevaleva



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5 Plaintiff Pro Se

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7 Date: August 12, 2021.
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